

# BRACEWELL

September 20, 2023

**VIA ECF**

The Honorable Jennifer H. Rearden  
United States District Judge  
500 Pearl St.  
Southern District of New York  
New York, NY 10007-1312

Re: *United States v. Charles McGonigal*, No. 1:23-cr-00016-JHR

Your Honor,

We write as counsel for Defendant Charles McGonigal to respectfully request an extension of time from September 22, 2023 until September 29, 2023 to provide the government a classified written summary of a supplement to the defendant's sentencing submission, for classification review and verification of certain dates and other information inaccessible to us.

This request for an extension is necessary because cleared defense counsel contracted Covid-19 and has been unable to meet with Mr. McGonigal in the SCIF as required to prepare and complete the classified draft. The CISO team has agreed to provide Mr. McGonigal and cleared counsel access to the SCIF on Monday, September 25, 2023 to allow for completion and submission of the classified summary to government on September 29, 2023.

This request is Mr. McGonigal's second request for an extension of the deadline to submit and is not made for the purposes of delay. The government consents to the extension, which is unlikely to impact the December 14, 2023 sentencing date.

Accordingly, we respectfully request a modest extension of one week, due to these unanticipated circumstances.

Respectfully submitted,



Seth D. DuCharme  
Meagan C. Maloney

**Seth D. DuCharme**  
**Meagan C. Maloney**

T: +1.212.508.6165 F: +1.800.404.3970  
31 W. 52nd Street, Suite 1900, New York, New York 10019-6118  
seth.ducharme@bracewell.com bracewell.com